

HERITAGE-WTI, INC. 1250 St. George Street

East Liverpool, Ohio 43920-3400

Phone: 330-385-7337 Fax: 330-385-7813

Web Site: www.heritage-wti.com

U.S. EPA, Region V
Waste Management Division
Mail Code HRP-8J
77 West Jackson
Chicago, IL 60604

Mr. Erik Bewley (sent electronically) Division of Air Pollution Control Northeast District Office 2110 East Aurora Road Twinsburg, Ohio 44087

RE:

Heritage-WTI, INC.

FACILITY ID: 02-15-02-0233 DATA ASSESSMENT REPORTS 3rd Quarter 2010

To whom it may concern:

Enclosed are the Data Assessment Reports (DARs) for the Relative Accuracy Test Audit (RATA) conducted **August 31-September 1, 2011** for Heritage-WTI, Inc.'s Continuous Emissions Monitoring System (CEMs).

The Data Assessment Report Forms, as Enclosure A, accompany this letter to US EPA only. They have been sent electronically to OEPA-DAPC. Attachment B contains the complete results of testing as provided to Heritage-WTI by Air Compliance Testing. Attachment C contains the calibration data sheets for the **3rd** quarter. Enclosure B and C are maintained onsite at Heritage-WTI and can be viewed upon request by agency personnel. This report displays that the Heritage-WTI CEMS have successfully met all the requirements of their applicable standards.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquire of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me.

Sincerely.

cc:

Frank Murray
General Manager
Heritage-WTI, Inc.

Michelle Tarka, OEPA-DHWM-NEDO (hand deliver, w/o attachments)

OHSAS 18001: 2007

ISO 14001: 2004

ISO 9001: 2008

October 31, 2011 VIA UPS and AIR SERVICES



ENCLOSURE A 3rd QUARTER 2011 DATA ASSESSMENT REPORT FORMS

October 31, 2011

Heritage-WTI, Inc.

EAST LIVERPOOL, OHIO

DATA ASSESSMENT REPORT STACK FLOW MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMs Manufacturer: Teledyne

Model No.: Model 150 CEMs Serial No.: 1501036 CEMs Type: In situ

CEMs Sampling Location: Stack

CEMs Span Values As Per the Applicable Regulation: 0 - 100,000 scfm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for flow.

Not applicable

B. Cylinder gas audit (CGA) for flow.

Not applicable

- C. Relative accuracy audit (RAA) for flow.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 1-4
 - 3. Average RM value: 79,248 scfm
 - 4. Average CEMs value: 76,609scfm
 - 5. Absolute value of mean difference (d): 2,638 scfm
 - 6. Confidence Interval (CI): 1672.3
 - 7. Percent relative accuracy (RA): 5.439 (% Reference Method)
 - 8. EPA performance audit results: NA
- D. Corrective action for excessive inaccuracy

Not applicable

L Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
7/22/11	0558	7/23/11	0611	Recalibrate
9/11/11	0558	9/12/11	0727	Recalibrate

DATA ASSESSMENT REPORT CO MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMs Manufacturer: Thermo

Model No.: 48i

CEMs Serial No.: CM10360078 CEMs Type: Dry extractive CEMs Sampling Location: Stack

CEMs Span Values As Per the Applicable Regulation: 0 - 700ppm

- I. Accuracy Assessment Results:
 - B. Relative accuracy test audit (RATA) for CO2.

Not applicable

B. Cylinder gas audit (CGA) for flow.

Not applicable

- C. Relative accuracy audit (RAA) for flow.
 - 3. Date of Audit: 9/1/2011
 - 4. Reference Methods (RM's) used: 1-4
 - 3. Average RM value: 0.419 lb/hr
 - 4. Average CEMs value: 0.367 lb/hr
 - 5. Absolute value of mean difference (d): 0.053 lb/hr
 - 6. Confidence Interval (CI): 0.015
 - 7. Percent relative accuracy (RA): 0.311 (% Applicable Standard)
 - 8. EPA performance audit results: NA
- D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT NO_x MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: CAI Model No.: 600CLD CEMS Serial No.: U12052 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 250 ppm

L Accuracy Assessment Results:

- A. Relative accuracy test audit (RATA) for NOx using Dry O2 #2, Wet O2 #2, Calculated Stack Flow.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 7E
 - 3. Average RM value: 16.277 lb/hr
 - 4. Average CEMs value: 16.953 lb/hr
 - 5. Absolute value of mean difference (d): -0.676 lb/hr
 - 6. Confidence Interval (CI): 0.961
 - 7. Percent relative accuracy (RA): 8.693 (applicable standard)
 - 8. EPA performance audit results: NA
- B. Cylinder gas audit (CGA) for NOx.

Not applicable

C. Relative accuracy audit (RAA) for NOx.

Not applicable

D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT SO₂ MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Thermo

Model No.: 43i-HL

CEMS Serial No.: 1027444707 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 100 ppm

L Accuracy Assessment Results:

- A. Relative accuracy test audit (RATA) for SO2.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 6C
 - 3. Average RM value: 1.043 lb/hr
 - 4. Average CEMs value: 0.291 lb/mm Btu
 - 5. Absolute value of mean difference (d): 0.752 lb/hr
 - 6. Confidence Interval (CI): 0.281
 - 7. Percent relative accuracy (RA): 9.112 (applicable standard)
 - 8. EPA performance audit results: NA
- B. Cylinder gas audit (CGA) for SO2.

Not applicable

C. Relative accuracy audit (RAA) for SO2.

Not applicable

D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT STACK #1 DRY O₂ MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Ametek

Model No.: 2000

CEMS Serial No.: C127340-1 CEMS Type: Extractive

CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0-25%

I. Accuracy Assessment Results:

- A. Relative accuracy test audit (RATA) for SO2.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 6C
 - 3. Average RM value: 15.086 %
 - 4. Average CEMs value: 14.689 %
 - 5. Absolute value of mean difference (d): 0.397%
 - 6. Confidence Interval (CI): 0.157
 - 7. Percent relative accuracy (RA): 0.397 (applicable standard)
 - 8. EPA performance audit results: NA
- B. Cylinder gas audit (CGA) for SO2.

Not applicable

C. Relative accuracy audit (RAA) for SO2.

Not applicable

D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT STACK #1 WET O2 MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTL, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Ametek

Model No.: 2000

CEMS Serial No.: C101180-102

CEMS Type: Extractive

CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0-25%

L Accuracy Assessment Results:

- A. Relative accuracy test audit (RATA) for SO2.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 6C
 - 3. Average RM value: 10.274%
 - 4. Average CEMs value: 10.646%
 - 5. Absolute value of mean difference (d): 0.078%
 - 6. Confidence Interval (CI): 0.137
 - 7. Percent relative accuracy (RA): 0.078 (applicable standard)
 - 8. EPA performance audit results: NA
- B. Cylinder gas audit (CGA) for SO2.

Not applicable

C. Relative accuracy audit (RAA) for SO2.

Not applicable

D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT STACK #2 DRY O₂ MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Ametek

Model No.: 2000

CEMS Serial No.: 10206379
CEMS Type: Extractive
CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0-25%

I. Accuracy Assessment Results:

- A. Relative accuracy test audit (RATA) for SO2.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 6C
 - 3. Average RM value: 15.086%
 - 4. Average CEMs value: 14.780%
 - 5. Absolute value of mean difference (d): 0.306%
 - 6. Confidence Interval (CI): 0.147
 - 7. Percent relative accuracy (RA): 0.306 (applicable standard)
 - 8. EPA performance audit results: NA
- B. Cylinder gas audit (CGA) for SO2.

Not applicable

C. Relative accuracy audit (RAA) for SO2.

Not applicable

D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
9/3/2011	0807	9/4/2011	0912	Recalibrate

DATA ASSESSMENT REPORT STACK #2 WET O₂ MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Ametek

Model No.: 2000

CEMS Serial No.: 10206503 CEMS Type: Extractive

CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0-25%

I. Accuracy Assessment Results:

- A. Relative accuracy test audit (RATA) for SO2.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 6C
 - 3. Average RM value: 10.724%
 - 4. Average CEMs value: 10.571%
 - 5. Absolute value of mean difference (d): 0.153%
 - 6. Confidence Interval (CI): 0.157
 - 7. Percent relative accuracy (RA): 0.153 (applicable standard)
 - 8. EPA performance audit results: NA
- B. Cylinder gas audit (CGA) for SO2.

Not applicable

C. Relative accuracy audit (RAA) for SO2.

Not applicable

D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT CAI THC #1 MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001
CEMS Manufacturer: CAI
Model No.: 600H FID
CEMS Serial No.: U12054
CEMS Type: Dry extractive
CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 100 ppm, 0-500ppm

I. Accuracy Assessment Results:

On August 31, 2011, THC monitor 1 was audited by calibration error and response time testing in accordance with USEPA document 530-SW-91-010 "Methods for Compliance with BIF Regulations," Section 2.2. Both a low and a high span were evaluated. The low span results indicate a calibration error at low, medium, and high ranges of -0.13, 2.33 and 2.84 percent respectively. The high span results indicate a calibration error at low, medium, and high ranges of 0.19, 4.56 and 4.56 percent respectively. See Tables Nos. 2.2.1, 2.3.1, and 2.3.2 for details on the results of this audit.

A. Relative accuracy test audit (RATA) for THC.

Not applicable.

B. Cylinder gas audit (CGA) for THC.

Not applicable

C. Relative accuracy audit (RAA) for THC.

Not applicable

D. Corrective action for excessive inaccuracy.

Not applicable

II. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
7/22/2011	0641	7/23/2011	1220	Recalibrate

DATA ASSESSMENT REPORT CAI THC #2 MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001
CEMS Manufacturer: CAI
Model No.: 600HFID
CEMS Serial No.: U12055
CEMS Type: Dry extractive
CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 100 ppm, 0-500ppm

I. Accuracy Assessment Results:

On August 31, 2011, THC monitor 2 was audited by calibration error and response time testing in accordance with USEPA document 530-SW-91-010 "Methods for Compliance with BIF Regulations," Section 2.2. Both a low and a high span were evaluated. The low span results indicate a calibration error at low, medium, and high ranges of -0.78, -0.09, and -1.70 percent respectively. The high span results indicate a calibration error at low, medium, and high ranges of -0.54, -5.24, and -2.65 percent respectively. See Table Nos. 2.2.1, 2.3.3, and 2.3.4 for details on the results of this audit.

A. Relative accuracy test audit (RATA) for THC.

Not applicable.

B. Cylinder gas audit (CGA) for THC.

Not applicable

C. Relative accuracy audit (RAA) for THC.

Not applicable

D. Corrective action for excessive inaccuracy.

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT OPACITY MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Teledyne Lighthawk

Model No.: 560

CEMS Serial No.: 5600687 CEMS Type: In situ

CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 100 percent

I. Accuracy Assessment Results:

The opacity monitor was audited in accordance with the procedures specified in PS-1. See Table Nos. 2.2.3, 2.5.1 and 2.5.2 for the results of this audit.

A. Relative accuracy test audit (RATA) for opacity.

Not applicable

B. Cylinder gas audit (CGA) for opacity.

Not applicable

C. Relative accuracy audit (RAA) for opacity.

Not applicable

D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT SCRUBBER OUTLET FLOW MONITOR

(Process Flow)

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMs Manufacturer: USI, Ultraflow

Model No.: Model 100 CEMs Serial No.: 9407820 CEMs Type: In situ

CEMs Sampling Location: Scrubber outlet

CEMs Span Values As Per the Applicable Regulation: 0 - 70,000 scfm

L Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for flow.

Not applicable

B. Cylinder gas audit (CGA) for flow.

Not applicable

- C. Relative accuracy audit (RAA) for flow.
 - 1. Date of Audit: 9/1/2011
 - 2. Reference Methods (RM's) used: 1-4
 - 3. Average RM value: 57,871 scfm
 - 4. Average CEMs value: 59,504 scfm
 - 5. Absolute value of mean difference (d): -1633 scfm
 - 6. Confidence Interval (CI): 653.9
 - 7. Percent relative accuracy (RA): 3.951 (applicable standard)
 - 8. EPA performance audit results: NA
- C. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT REHEAT FLOW MONITOR

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMs Manufacturer: USI, Ultraflow

Model No.: Model 100

CEMs Serial No.: Q-08572U-0793

CEMs Type: In situ

CEMs Sampling Location: Reheat duct

CEMs Span Values As Per the Applicable Regulation: 0 - 50,000 scfm

I. Accuracy Assessment Results:

D. Relative accuracy test audit (RATA) for flow.

Not applicable

B. Cylinder gas audit (CGA) for flow.

Not applicable

- C. Relative accuracy audit (RAA) for flow.
 - 5. Date of Audit: 9/1/2011
 - 6. Reference Methods (RM's) used: 1-4
 - 3. Average RM value: 16,759 scfm
 - 4. Average CEMs value: 19,477scfm
 - 5. Absolute value of mean difference (d): -2718 scfm
 - 6. Confidence Interval (CI): 298.6
 - 7. Percent relative accuracy (RA): 17.999 (applicable standard)
 - 8. EPA performance audit results: NA
- D. Corrective action for excessive inaccuracy

Not applicable

II. Calibration Drift Assessment

DATA ASSESSMENT REPORT VAPOR RECOVERY THC ANALYZER (NORTH)

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: California

Model No.: 600 Series CEMS Serial No.: T10031 CEMS Type: Dry extractive

CEMS Sampling Location: Inter-box Connector

CEMS Span Values As Per the Applicable Regulation: 0 - 200 ppm

I. Accuracy Assessment Results:

On August 31, 2011, Vapor Recovery THC (north) was audited by calibration error and response time testing in accordance with USEPA document 530-SW-91-010 "Methods for Compliance with BIF Regulations," Section 2.2. Both a low and a high span were evaluated. The results indicate a calibration error at low, medium, and high ranges of -1.37, 0.40 and -0.02 percent respectively. See Table Nos. 2.3.5 for details on the results of this audit.

A. Relative accuracy test audit (RATA) for THC.

Not applicable.

B. Cylinder gas audit (CGA) for THC.

Not applicable

C. Relative accuracy audit (RAA) for THC.

Not applicable

D. Corrective action for excessive inaccuracy.

Not applicable

III. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
7/22/2011	0651	7/23/2011	1143	Recalibrate

DATA ASSESSMENT REPORT VAPOR RECOVERY THC ANALYZER (SOUTH)

Period ending date: September 30

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: California

Model No.: 600 Series CEMS Serial No.: T10033 CEMS Type: Dry extractive

CEMS Sampling Location: Inter-box Connector

CEMS Span Values As Per the Applicable Regulation: 0 - 200 ppm

I. Accuracy Assessment Results:

On August 31, 2011, Vapor Recovery THC (south) was audited by calibration error and response time testing in accordance with USEPA document 530-SW-91-010 "Methods for Compliance with BIF Regulations," Section 2.2. Both a low and a high span were evaluated. The results indicate a calibration error at low, medium, and high ranges of -0.44, 0.47 and 0.76 percent respectively. See Table Nos. 2.3.6 for details on the results of this audit.

A. Relative accuracy test audit (RATA) for THC.

Not applicable.

B. Cylinder gas audit (CGA) for THC.

Not applicable

C. Relative accuracy audit (RAA) for THC.

Not applicable

D. Corrective action for excessive inaccuracy.

Not applicable

II. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
7/22/2011	0651	7/23/2011	1143	Recalibrate

**** END OF REPORT ****



HERITAGE-WTI, INC. 1250 St. George Street

East Liverpool, Ohio 43920-3400

Phone: 330-385-7337 Fax: 330-385-7813

Web Site: www.heritage-wti.com

Mr. Wen Huang U.S. EPA, Region V Waste Management Division Mail Code HRP-8J 77 West Jackson Chicago, IL 60604

Mr. Eric Bewley (sent electronically) Division of Air Pollution Control Northeast District Office 2110 East Aurora Road Twinsburg, Ohio 44087

RE:

Heritage-WTI, INC.

FACILITY ID: 02-15-02-0233 DATA ASSESSMENT REPORTS

4th Quarter 2011

To whom it may concern:

Enclosed are the Data Assessment Reports (DARs) for the Relative Accuracy Test Audit (RATA) conducted November 1-2, 2011 for Heritage-WTI, Inc.'s Continuous Emissions Monitoring System (CEMs).

The Data Assessment Report Forms, as Enclosure A, accompany this letter to US EPA only. They have been sent electronically to OEPA-DAPC. Attachment B contains the complete results of testing as provided to Heritage-WTI by Air Compliance Testing. Attachment C contains the calibration data sheets for the 4th quarter. Enclosure B and C are maintained onsite at Heritage-WTI and can be viewed upon request by agency personnel. This report displays that the Heritage-WTI CEMS have successfully met all the requirements of their applicable standards.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquire of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."

As always if you have any questions and/or comments feel free to contact me.

Sincerely,

General Manager Heritage-WTI, Inc.

Fruit Murrey

cc: Michelle Tarka, OEPA-DHWM-NEDO (hand deliver, w/o attachments)

OHSAS 18001: 2007

ISO 14001: 2004

ISO 9001: 2008

January 31, 2012 VIA UPS and AIR SERVICES





HERITAGE-WTI, INC. 1250 St. George Street East Liverpool, Ohio 43920-3400

Phone: 330-385-7337 Fax: 330-385-7813

Web Site: www.heritage-wti.com

OHSAS 18001: 2007 ISO 14001: 2004

ISO 9001: 2008

ENCLOSURE A 4th QUARTER 2011 DATA ASSESSMENT REPORT FORMS

JANUARY 31, 2012

Heritage-WTI, Inc.

EAST LIVERPOOL, OHIO



STACK CO MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: Thermo

Model No.: 48i

CEMS Serial No.: 48-50626-285 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values (Dual Range): 0-250, 0 - 750ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for CO:

Not applicable

B. Cylinder gas audit (CGA) for CO.

	AUDIT POINT 1 (LOW)	AUDIT POINT 2 (HIGH)
DATE OF AUDIT	11/2/2011	11/2/2011
CYLINDER ID NO.	XC004407B	CC14343
DATE OF CERTIFICATION	1/11/2011	3/1/2011
TYPE OF CERTIFICATION	EPA Protocol 1	EPA Protocol 1
CERTIFIED AUDIT VALUE (PPM)	203.00	401.90
WTI CEMS RESPONSE	206.70	408.10
ACCURACY (%)	0.49	0.83

C. Relative accuracy audit (RAA) for CO:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

STACK #1 DRY O₂ MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Ametek

Model No.: 2001

CEMS Serial No.: C127340-1 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 – 25%

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for O₂: Not applicable

B. Cylinder gas audit (CGA) for O₂

	A LIDITE DODATE (AVWYT DODYTO	
	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011
CYLINDER ID NO.	XC004302B	CC239858	CA02136
DATE OF CERTIFICATION	2/21/2011	2/8/2011	10/26/2010
TYPE OF CERTIFICATION	~	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (%)	1.007	9.019	15.15
WTI CEMS RESPONSE	1.04	8.84	14.91
DIFFERENCE(%)	0.04	0.18	0.24

C. Relative accuracy audit (RAA) for O₂:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

STACK #2 DRY O2 MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: Ametex

Model No.: 2000

CEMS Serial No.: 10206379 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 - 25 %

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for O₂: Not applicable

B. Cylinder gas audit (CGA) for O₂.

D. Cymider gas addi	it (CO11) for C ₂ .		
	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011
CYLINDER ID NO.	XC004302B	CC239858	CA02136
DATE OF CERTIFICATION	2/21/2011	2/8/2011	10/26/2010
TYPE OF CERTIFICATION	-	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (%)	1.007	9.019	15.15
WTI CEMS RESPONSE	1.08	8.94	15.04
DIFFERENCE (%)	0.07	0.08	0.11

C. Relative accuracy audit (RAA) for O_2 :

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

SO₂ MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: Bovar

Model No.: 721M

CEMS Serial No.: 95-721M8281-2 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 - 100 ppmd

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for SO₂: Not applicable

B. Cylinder gas audit (CGA) for SO2.

	AUDIT POINT 1	AUDIT POINT 2
DATE OF AUDIT	11/2/2011	11/2/2011
CYLINDER ID NO.	CC131866	SG9148843BAL
DATE OF CERTIFICATION	5/13/2011	8/24/2010
TYPE OF CERTIFICATION	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (PPM)	25.42	55.76
WTI CEMS RESPONSE	25.55	52.02
ACCURACY (%)	0.52	6.70

C. Relative Accuracy audit (RAA) for SO₂:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

STACK #1 O2 WET MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: Ametex

Model No.: 2000

CEMS Serial No.: C101180-102

CEMS Type: In situ

CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 - 25 %

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for O₂: Not applicable

B. Cylinder gas audit (CGA) for O₂:

	, dudin (0011) 101 02.		
	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011
CYLINDER ID NO.	XC004302B	CC239858	CA02136
DATE OF CERTIFICATION	2/21/2011	2/8/2011	10/26/2010
TYPE OF CERTIFICATION	-	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (PPM)	1.007	9.019	15.15
WTI CEMS RESPONSE	1.08	9.25	15.31
AVG.DIFFERENCE (%)	0.07	0.23	0.16

C. Relative accuracy audit (RAA) for O_2 :

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

STACK #2 O2 WET MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: Ametex

Model No.: 2000

CEMS Serial No.: 10206503

CEMS Type: In situ

CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 - 25 %

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for O₂: Not applicable

C. Cylinder gas audit (CGA) for O_2 :

	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011
CYLINDER ID NO.	XC004302B	CC239858	CA02136
DATE OF CERTIFICATION	2/21/2011	2/8/2011	10/26/2010
TYPE OF CERTIFICATION	-	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (PPM)	1.007	9.019	15.15
WTI CEMS RESPONSE	1.09	9.28	15.39
AVG.DIFFERENCE (%)	0.08	0,26	0.24

C. Relative accuracy audit (RAA) for O₂:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

NOx MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001
CEMS Manufacturer: CAI
Model No.: 600CLD
CEMS Serial No.: U12052
CEMS Type: Dry extractive
CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 - 250 ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for NOx:

Not applicable

B. Cylinder gas audit (CGA) for NO_x.

	AUDIT POINT 1	AUDIT POINT 2
DATE OF AUDIT	11/2/2011	11/2/2011
CYLINDER ID NO.	ХС028627В	CC15184
DATE OF CERTIFICATION	8/2/2013	4/5/2011
TYPE OF CERTIFICATION	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (PPM)	61.55	139.80
WTI CEMS RESPONSE	64.45	144.31
ACCURACY (%)	4.71	3.22

C. Relative accuracy audit (RAA) for NOx:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

THC #1 MONITOR - LOW RANGE

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: CAI Model No.: 600HFID CEMS Serial No.: U12054 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 100 ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for NOx:

Not applicable

B. Cylinder gas audit (CGA) for NO_x.

D. Cymiad gus mun (CCH) IV 1703.				
	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3	
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011	
CYLINDER ID NO.	_	EB0013454	CC166015	
DATE OF CERTIFICATION	-	3/28/2011	6/16/2010	
TYPE OF CERTIFICATION	-	EPA PROTOCOL 1	EPA PROTOCOL 1	
CERTIFIED AUDIT VALUE (PPM)	0.00	36.40	75.09	
WTI CEMS RESPONSE	-0.38	36.53	73.92	
ACCURACY (%)	0.38	0.13	1.17	

C. Relative accuracy audit (RAA) for NOx:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
10/24/2011	0641	10/25/2011	0708	Re-calibration

THC #1 MONITOR - HIGH RANGE

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001 CEMS Manufacturer: CAI Model No.: 600HFID CEMS Serial No.: U12054 CEMS Type: Dry extractive CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 500 ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for NOx:

Not applicable

B. Cylinder gas audit (CGA) for NO_x.

	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011
CYLINDER ID NO.	-	SG9153095BAL	CC112315
DATE OF CERTIFICATION	_	3/22/2010	6/16/2010
TYPE OF CERTIFICATION	-	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (PPM)	0.00	186.20	377.30
WTI CEMS RESPONSE	-0.08	183.97	375.28
ACCURACY (%)	0.02	0.45	0.40

C. Relative accuracy audit (RAA) for NOx:D. Corrective action for excessive inaccuracy:

Not applicable Not applicable

II. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
10/24/2011	0641	10/25/2011	0708	Re-calibration

THC #2 MONITOR - LOW RANGE

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001
CEMS Manufacturer: CAI
Model No.: 600HFID
CEMS Serial No.: U12055
CEMS Type: Dry extractive
CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 100 ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for NOx:

Not applicable

B. Cylinder gas audit (CGA) for NO_x.

	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011
CYLINDER ID NO.	-	EB0013454	CC166015
DATE OF CERTIFICATION	-	3/28/2011	6/16/2010
TYPE OF CERTIFICATION		EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (PPM)	0.00	36.40	75.09
WTI CEMS RESPONSE	-0.37	38.21	78.13
ACCURACY (%)	0.37	1.81	3.04

C. Relative accuracy audit (RAA) for NOx:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

THC #2 MONITOR - HIGH RANGE

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001
CEMS Manufacturer: CAI
Model No.: 600HFID
CEMS Serial No.: U12055
CEMS Type: Dry extractive
CEMS Sampling Location: Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 500 ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for NOx:

Not applicable

B. Cylinder gas audit (CGA) for NO_x.

	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/2/2011	11/2/2011	11/2/2011
CYLINDER ID NO.	-	SG9153095BAL	CC112315
DATE OF CERTIFICATION	-	3/22/2010	6/16/2010
TYPE OF CERTIFICATION	-	EPA PROTOCOL 1	EPA PROTOCOL 1
CERTIFIED AUDIT VALUE (PPM)	0.00	186.20	377.30
WTI CEMS RESPONSE	-0.21	186.27	378.65
ACCURACY (%)	0.21	0.01	0.27

C. Relative accuracy audit (RAA) for NOx:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

VAPOR RECOVERY THC #1 MONITOR

(Interbox North)

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: P001, F002 CEMS Manufacturer: California

Model No.: 600H

CEMS Serial No.: T10031 CEMS Type: Dry extractive

CEMS Sampling Location: Vapor Recovery Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 200 ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for NOx:

Not applicable

B. Cylinder gas audit (CGA) for NO_x.

D. Of Medic gas Built (COTI) for Trox.				
	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3	
DATE OF AUDIT	11/1/2011	11/1/2011	11/1/2011	
CYLINDER ID NO.	-	CC18098	EB0013445	
DATE OF CERTIFICATION	-	2/22/2011	10/6/2008	
TYPE OF CERTIFICATION	-	EPA PROTOCOL G-1	EPA PROTOCOL G-1	
CERTIFIED AUDIT VALUE (PPM)	0.00	49.99	153.90	
WTI CEMS RESPONSE	1.04	49.91	152.46	
ACCURACY (%)	0.52	0.04	0.72	

C. Relative accuracy audit (RAA) for NOx:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
10/21/2011	0541	10/22/2011	0818	Re-calibration
12/1/2011	0651	12/2/2011	0801	Re-calibration

VAPOR RECOVERY THC #2 MONITOR

(Interbox South)

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: P001, F002 CEMS Manufacturer: California

Model No.: 600H

CEMS Serial No.: T10033 CEMS Type: Dry extractive

CEMS Sampling Location: Vapor Recovery Stack

CEMS Span Values As Per the Applicable Regulation: 0 - 200 ppm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for NOx:

Not applicable

B. Cylinder gas audit (CGA) for NO_x.

	AUDIT POINT 1	AUDIT POINT 2	AUDIT POINT 3
DATE OF AUDIT	11/1/2011	11/1/2011	11/1/2011
CYLINDER ID NO.	-	CC18098	EB0013445
DATE OF CERTIFICATION	_	2/22/2011	10/6/2008
TYPE OF CERTIFICATION	-	EPA PROTOCOL G-1	EPA PROTOCOL G-1
CERTIFIED AUDIT VALUE (PPM)	0.00	49.99	153.90
WTI CEMS RESPONSE	-0.70	49.85	154.16
ACCURACY (%)	0.35	0.07	0.13

C. Relative accuracy audit (RAA) for NOx:

Not applicable

D. Corrective action for excessive inaccuracy:

Not applicable

II. Calibration Drift Assessment

START DATE	START TIME	END DATE	END TIME	CORRECTIVE ACTION
10/21/2011	0541	10/22/2011	0818	Re-calibration
12/1/2011	0651	12/2/2011	0801	Re-calibration

OPACITY MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Teledyne Model No.: Lighthawk 560 CEMS Serial No.: 5600687 CEMS Type: In situ

CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 - 100 percent

I. Accuracy Assessment Results:

The opacity monitor was audited according to the USEPA document 450/4-92-010 "Performance Audit Procedure for Opacity Monitors," April 1992 on 11/2/2011. See Enclosure B, Tables 2.2.4 and 2.5.2 for the results of this audit.

A. Relative accuracy test audit (RATA) for opacity: Not applicable

B. Cylinder gas audit (CGA) for opacity: Not applicable

C. Relative accuracy audit (RAA) for opacity: Not applicable

D. Corrective action for excessive inaccuracy: Not applicable

II. Calibration Drift Assessment

REHEAT FLOW MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: USI, Ultraflow

Model No.: Model 100

CEMS Serial No.: Q-08572U-0793

CEMS Type: In situ

CEMS Sampling Location: Reheat duct

CEMS Span Values As Per the Applicable Regulation: 0 - 50,000 scfm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for flow: Not applicable

B. Cylinder gas audit (CGA) for flow: Not applicable

C. Relative accuracy audit (RAA) for flow:

1. Date of audit: 11/2/2011

2. Reference methods (RM's) used: 1 - 4

3. Average RM value: 17,555 wscfm

4. Average CEMS value: 19,929 wscfm

5. Accuracy percent: 13.524 (applicable standard 15%)

6. EPA performance audit results: Not applicable

D. Corrective action for excessive inaccuracy: Not applicable

II. Calibration Drift Assessment

STACK FLOW MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: Teledyne

Model No.: Model 150 CEMS Serial No.: 1501036 CEMS Type: In situ

CEMS Sampling Location: Stack

CEMS Span Values As Per The Applicable Regulation: 0 - 100,000 scfm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for flow: Not applicable

B. Cylinder gas audit (CGA) for flow: Not applicable

C. Relative accuracy audit (RAA) for flow:

1. Date of audit: 11/2/2011

- 2. Reference methods (RM's) used: 1 4
- 3. Average RM value: 7,028 wscfm
- 4. Average CEMS value: 75,934 wscfm
- 5. Accuracy percent: 1.420 (applicable standard 15%)
- 6. EPA performance audit results: Not applicable
- D. Corrective action for excessive inaccuracy: Not applicable

II. Calibration Drift Assessment

SCRUBBER OUTLET FLOW MONITOR

Period ending date: December 31

Year: 2011

Company Name: Heritage-WTI, Inc.

Address: 1250 St. George Street, East Liverpool, OH 43920-6026

Source Unit No.: N001

CEMS Manufacturer: USI, Ultraflow

Model No.: Model 100 CEMS Serial No.: 9407820 CEMS Type: In situ

CEMS Sampling Location: Scrubber outlet

CEMS Span Values As Per the Applicable Regulation: 0 - 70,000 scfm

I. Accuracy Assessment Results:

A. Relative accuracy test audit (RATA) for flow: Not applicable

B. Cylinder gas audit (CGA) for flow: Not applicable

C. Relative accuracy audit (RAA) for flow:

1. Date of audit: 11/2/2011

2. Reference methods (RM's) used: 1 - 4

3. Average RM value: 57,921 wscfm

4. Average CEMS value: 55,930 wscfm

5. Accuracy percent: 3.437 (applicable standard 15%)6. EPA performance audit results: Not applicable

D. Corrective action for excessive inaccuracy: Not applicable

II. Calibration Drift Assessment

There were no "out of control" periods for the monitor as defined in 40 CFR 60, App. F

End of Report